

George Latimer County Executive

Department of Law

John M. Nonna County Attorney

February 1, 2023

VIA CM/ECF

Hon. Kenneth M. Karas United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601-4150

Re: Joint Letter Motion for Extension of Time to Respond to Complaint

Lane v. James et. al., No. 22-cv-10989 (KMK) (S.D.N.Y.)

Your Honor,

In compliance with Rule 1(C) of Your Honor's Individual Rules of Practice dated February 5, 2020, defendant Miriam E. Rocah, in her official capacity as District Attorney for the County of Westchester, New York (hereinafter "DA Rocah"), together with our co-defendants Letitia James, in her official capacity as Attorney General of the State of New York and Steven Nigrelli, in his official capacity as Superintendent of the New York State Police (hereinafter "the State Defendants"), hereby request an extension of time to respond to the Complaint filed in the above-referenced action to **March 3, 2023**.

This is the Defendants' first request for an extension. DA Rocah's response is currently due February 3, 2023 and the State Defendants' response is currently due February 8, 2023. Plaintiffs' counsel has consented to our request for an adjournment.

Respectfully submitted,

JOHN M. NONNA

Westchester County Attorney
Attorney for County Defendants

By:

Telephone: 914-995-2660

Phoenix Marino

Assistant County Attorney, of Counsel Michaelian Office Building 148 Martine Avenue, Room 600

White Plains, NY 10601

(914) 995-5103

pqmr@westchestergov.com

Fax: 914-995-3132



PM/

CC: Nicolas J. Rotsko, Esq. (via CM/ECF)
PHILLIPS LYTLE, LLP
Counsel for Plaintiffs
One Canalside
125 Main Street
Buffalo, New York 14203-2887
nrotsko@phillipslytle.com

Yuval Rubinstein, Esq. (via email) Counsel for State Defendants 28 Liberty Street New York, New York 10005 yuval.rubinstein@ag.ny.gov Granted.

So Ordered.